

**DICKINSON WRIGHT PLLC**

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*Additional Counsel on Signature Block*

*Attorneys for Nominal Defendant Monster  
Products, Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

FRED KHALILIAN, Derivatively on Behalf  
of Nominal Defendant, MONSTER  
PRODUCTS INC.,

Plaintiff,

vs.

MONSTER PRODUCTS, INC., a Nevada  
corporation; NOEL LEE, an individual;  
KEVIN LEE, an individual; BRUCE  
GIESBRECHT, an individual; DOES I  
through X, inclusive; and ROE ENTITIES XI  
through M, inclusive,

Defendants.

and

Nominal Defendant, MONSTER PRODUCTS,  
INC.,

Case No.: 2:19-cv-00831-JAD-BNW

**DEFENDANT MONSTER PRODUCTS,  
INC.'S CORPORATE DISCLOSURE  
STATEMENT AND CERTIFICATE AS  
TO INTERESTED PARTIES  
PURSUANT TO F.R.C.P. 7.1 AND L.R.  
7.1-1**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and Rule 7.1-1 of the Local  
Rules of the District of Nevada, Nominal Defendant Monster Products, Inc. by and through its  
attorneys, the law firm of Dickinson Wright PLLC and Goodwin Procter LLP, certify that there  
are no known interested parties who may have a direct, pecuniary interest in the outcome of the  
case, other than those parties participating in the case.

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1 These representations are made to enable judges of the Court to evaluate possible  
2 disqualifications or recusal.

3  
4 DATED this 30<sup>th</sup> day of September 2019.

5 Respectfully submitted,

6 **DICKINSON WRIGHT PLLC**

7 /s/ Michael N. Feder

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*Attorneys for Nominal Defendant Monster  
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**CERTIFICATE OF SERVICE**

In accordance with Fed. R. Civ. P. 5, I hereby certify that on the 30<sup>th</sup> day of September 2019, a copy of the foregoing **DEFENDANT MONSTER PRODUCTS, INC.’S CORPORATE DISCLOSURE STATEMENT AND CERTIFICATE AS TO INTERESTED PARTIES PURSUANT TO F.R.C.P. 7.1 AND L.R. 7.1-1** was served on the following via CM-ECF filing:

Elaine A. Dowling, ESQ.  
EAD Law Group, LLC  
8275 S. Eastern Avenue, Suite 200  
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*Attorney for Plaintiff*

and **by placing said copy in an envelope**, postage fully prepaid, in the U.S. Mail at Las Vegas, Nevada, said envelope addressed to:

Fred Khalilian  
6245 Wilshire Blvd.,  
Los Angeles, California 90048

*Plaintiff*

/s/ Max Erwin

An employee of Dickinson Wright PLLC